

SOMMER & SCHROEDER, S. C.

ATTORNEYS AT LAW

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RHINELANDER, WISCONSIN 54501-0837

July 27, 1982

RICHARD E. SOMMER  
WILLIAM A. SCHROEDER  
TIM A. KORF

TELEPHONE  
715-362-5157

EPA Region 5 Records Ctr.



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JUL 30 1982

ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

Robert A. Wengrow  
Rockford Region Manager  
Field Operations Section  
Division of Land/Noise Pollution Control  
Illinois Environmental Protection Agency  
P. O. Box 915  
Rockford, Illinois 61105

File → Re - Winnebago County-20103502-Rockton/Soterion  
Triumph Twist Drill Co.

Dear Mr. Wengrow:

Please be advised that we represent Triumph Twist Drill of Rhineland, Wisconsin here in Wisconsin and are responding to your letter of July 22, 1982. We do not represent Triumph in Illinois, and in the event further correspondence or handling is required, we will refer you to Illinois attorneys acting on Triumph's behalf.

I can tell you, however, that Wisconsin does not regard the waste which you describe in your July 22 letter as a hazardous waste, and apparently this material is being landfilled here in the Rhineland area. It is not classified as a hazardous waste nor a toxic waste, as I am advised, here in Wisconsin.

Moreover, the hauler of this waste was, actually, the owner of the waste. He purchased the product from my client at its loading dock here in Rhineland and, accordingly, I would believe that any manifest which Chapter 9 of your special waste hauling regulations might require would be his obligation as the owner of that product.

The last sale of this type of work occurred on March 9, 1982. Since that time, my client has not sold waste to anyone, nor do they contemplate doing so in the future. As I explained previously, the waste is now being

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- D.L.P.C.  
STATE OF ILLINOIS

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Mr. Robert A. Wengrow  
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disposed of by landfilling here in Northern Wisconsin. If you have any questions, I will be happy to talk to you about them over the telephone, or by such means of communication as you may feel appropriate. I simply wish to assure you that my client did not haul the waste and, indeed, did not own it at any time after it left the Triumph loading dock here in Rhinelander.

If you have questions, do not hesitate to give me a call.

Very truly yours,

SOMMER & SCHROEDER, S. C.



R. E. Sommer

RES/js

CC: Conrad Peacock  
Lloyd Miller  
James Beck  
Stuart K. Taussig